

From: "John M. LaRosa, Esquire" <JLR@LaRosaLaw.com>  
To: "Affrunti, Sherri A." <saffrunti@reedsmith.com>  
Cc: "Wilson, Stephanie Esq." <swilson@reedsmith.com>; "Neuberger, Esq. Thomas S." <TSN@NeubergerLaw.com>; "Neuberger, Esq., Stephen" <SJN@NeubergerLaw.com>  
Subject: Fw: Linda Blozis v. Mellon: Confidentiality Agreement Defense Draft 2  
Date: Thursday, July 20, 2006 8:54 AM

Linda Blozis v. MellonSherri:

I am faxing back a revised copy of the draft confidentiality agreement with revisions to para. 2.b, 2.c, and the signature block.

The main issue is para. 2.b. We insist on deleting its sentence 2 for the reason noted by my co-counsel below.

Very truly yours,

John M. LaRosa

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----- Original Message -----

From: Stephen J. Neuberger  
To: John M. LaRosa, Esquire  
Cc: Neuberger, Esq. Thomas S.  
Sent: Wednesday, July 19, 2006 8:16 PM  
Subject: Re: Linda Blozis v. Mellon: Confidentiality Agreement Defense Draft 2

John,

I've reviewed the draft.

Only one issue. Everything works except the language they refuse to take out of paragraph 2.b. We won't agree to them only stamping confidential to the first page of a thousand page stack of documents, wrapping a rubber band around them and then saying they are all confidential.

We've gotten burned on this in the past. Each page has to be stamped confidential or we simply won't sign.

-Steve